

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

OLIN EARGLE,  
individually and on behalf of a class,

Plaintiff,

V.

B & H SUBS, INC.,  
and DOES 1-10,

Defendants.

Case No. 08 C 1426

Judge Darrah

## Magistrate Judge Keys

## DEFENDANT'S MOTION FOR ENTRY OF PROTECTIVE ORDER

NOW COMES, Defendant, B&H Subs, Inc., by and through its attorneys, Eric L. Samore and Darren P. Grady, and pursuant to Federal Rule of Civil Procedure 26(c), moves this Honorable Court for entry of an Agreed Protective Order in this case. In support, Defendant states as follows:

1. Defendant has generated a proposed, Protective Order (the “Order”) for purposes of protecting production of certain documents and other information in this case. (Protective Order attached hereto as **Exhibit A.**) The Order contains the specific provisions required by this Honorable Court in its standing order. (*See* Exh. A, ¶¶ 10, 18.)

2. Entry of this Order is just and reasonable to protect the Parties from disclosure of protected or confidential information, such as a trade secret or other confidential research, development, or commercial information. *See* FED. R. CIV. PRO. 26(c)(7).

3. Defendant and Plaintiff's counsel have agreed on the entry of the Order and there has been no objection to the seeking of this Order.

WHEREFORE, Defendant, B&H Subs, Inc., respectfully requests that this Honorable Court enter the Protective Order that is submitted herewith as Exhibit A and grant such other relief as this Court deems appropriate.

Respectfully submitted,

SMITHAMUNDSEN LLC

By: /s/ Darren P. Grady  
Attorneys for Defendant

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